

## Memorandum

To : Advice Request Meeting Participants

Date : January 2, 1986

No. M-86-033

From : FAIR POLITICAL PRACTICES COMMISSION  
Carla Wardlow

Subject: Lobbyist Termination

Government Code Section 86107 requires a lobbyist to file a notice of termination within 30 days after ceasing the activity which required registration. Should a lobbyist who no longer meets the definition of a lobbyist in regulation 18239, but who still does some lobbying, be allowed to terminate?

Please review the following and we can discuss if either of these lobbyists should be allowed to file a notice of termination:

1. Lobbyist A qualified and registered under the old compensation/time tests contained in regulation 18239. He has never met the \$2,000/25 contacts test set out in the amended version of 18239. Lobbyist A will have to register as a lobbying firm in 1986 and is wondering if he can terminate instead. (Note: When 18239 was revised in 1984, we did allow lobbyists who no longer qualified to terminate at that time. I do not know why Lobbyist A did not terminate.)
2. Lobbyist B qualified and registered as a lobbyist under the \$2,000/25 contacts tests. She recently went to work for a new company and does some lobbying along with other duties. She does not receive \$2,000 in a calendar month for lobbying activities, and has asked whether she would be allowed to terminate if she is very careful to keep her contacts under 25 in the future.

ANSWER: Neither lobbyist may terminate at this time. If an individual no longer qualifies as a lobbyist at the time registrations are renewed (prior to the regular legislative session) the individual need not renew his or her certification.